

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES

v.

ANTHONY BUCCI

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No. 04-cr-10194-RCL

**AMENDED MOTION TO SUBSTITUTE PROPERTY TO SECURE BOND**

The defendant respectfully moves the Court for leave to substitute real property located at 26 Upland Road, Wakefield, Massachusetts for the real property located at 6 Maple Road, North Reading, Massachusetts that is now partially securing his appearance bond. The defendant stipulates and agrees that the property located at 500 Salem Street, Unit 607, Medford, Massachusetts which is also partially securing his bond shall remain as security for that bond.

In support hereof, the defendant respectfully says:

1. His wife, child, mother (who is his third-party custodian), and himself currently reside at 26 Upland Road, Wakefield as the family's sole residence.
2. The property at 6 Maple Road, North Reading, Massachusetts that is currently partially securing his appearance bond is under contract to be sold.
3. The mortgage currently held by the United States on the North Reading property must be discharged before the property can be sold.
4. The property at 26 Upland Road, Wakefield has approximately \$300,000.00 in equity as demonstrated by the documents filed with the Clerk's office in support of this motion.
5. The mortgage held by the United States to secure the defendant's appearance

bond is in the amount of \$100,000.00.

6. Thus, there is more than enough equity in the Wakefield property to secure the defendant's appearance bond.
7. The government will in no way be prejudiced or its position compromised by the substitution of the property as requested.

Anthony Bucci  
By his attorney,

/s/Michael F. Natola

April 5, 2005

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing motion has been served the above date, electronically, upon Assistant U.S. Attorney John T. McNeil.

/s/ Michael F. Natola

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